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# Public Utility Commission of Texas

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Pat Wood, III  
Chairman

Judy Walsh  
Commissioner

Brett A. Perlman  
Commissioner

June 24, 1999

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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RE: CC Docket No. 98-170 (FCC 99-72)  
In the Matter of Truth-in-Billing Format

To the Secretary:

Enclosed herewith for filing with the Commission are an original plus four copies of the Comments of the Public Utility Commission of Texas in the above captioned matter. By a copy of this transmittal, we are also providing an electronic copy of the filing as requested.

Please acknowledge receipt by affixing an appropriate notation on the duplicate copy of this letter furnished herewith for that purpose and returning same to the undersigned in the enclosed, self-addressed envelope.

Sincerely,

Saralee Tiede  
Director, Office of Customer Protection

Cc: International Transcription Service, Inc.  
David Konuch (electronic copy)

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of

Truth-in-Billing and Billing Format

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CC Docket No. 98-170

**FURTHER COMMENTS OF  
THE PUBLIC UTILITY COMMISSION OF TEXAS**

1. On May 11, 1999 the Federal Communications Commission (FCC or Commission) released the First Report and Order and Further Notice of Proposed Rulemaking (Further NPRM) on Truth-in-Billing and Bill Format. The Public Utility Commission of Texas (Texas PUC) having been given general regulatory authority over public utilities within our jurisdiction in Texas, hereby submits these further comments on the NPRM. These comments are confined to a single issue, Standard Labels for Line-Item Charges, on which the FCC seeks comment. The Texas PUC previously filed Comments in response to the Commission's initial NPRM in this proceeding.<sup>1</sup>
2. The FCC adopts a guideline that carriers must use standardized labels to refer to certain charges relating to federal regulatory action and seeks comment on the specific labels that carriers should adopt. The Texas PUC strongly endorses this guideline since the proliferation of names for these charges by different carriers has caused acute customer confusion. The lack of standard nomenclature for these charges makes it much more difficult for customers to detect fraudulent charges and encourages the extensive lists of unrelated fees and charges that appear on most telephone bills. Senate Bill 560, passed by the 76<sup>th</sup> session of the Texas Legislature

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<sup>1</sup> *In the Matter of Truth-in-Billing and Billing Format*, Notice of Proposed Rulemaking, CC Docket No. 98-170, 13 FCC rcd 18176 (Sept. 17, 1998)

last month, addressed this issue by directing local exchange companies to “include an aggregate charge for each of the following categories:

- (1) basic local service charges and fees, which includes carrier’s charges for basic local telecommunications service and related fees, assessments, and surcharges;
- (2) optional services; and
- (3) taxes, which includes any taxes applicable to the charges described in Subdivisions (1) and (2).”

The FCC seeks comment on the specific labels proposed: “Long Distance Access” to identify charges related to interexchange carriers’ costs for access to the networks of local exchange carriers; “Federal Universal Service” to describe line items seeking to recover from customers carriers’ universal service contributions; and “Number Portability” to describe charges relating to local number portability. Based on views from our customer focus group on bill format, the Texas PUC believes any label should be short, simple and accurate.

Both “Long Distance Access” and “Federal Universal Service” fit this description although the word “access” has more meaning to those in the telecommunications industry than to customers. “Long Distance Connection” might do as well.

Southwestern Bell and other carriers use the “Number Portability” label now, and it has caused numerous complaints to our customer hotline. Customers assume that it means they can keep the same telephone number when they change addresses and are distressed to discover that it applies only to changes in providers. “Number Portability” implies that a telephone number is portable in all circumstances.

The FCC also seeks comment on how carriers should identify line items that combine two or all of these charges into a single charge. We find this to be the most customer-friendly and least confusing option. All of these charges are necessary for a competitive marketplace, and the distinction between them is largely lost on customers. Three separate items make the bill longer and encourage the separate listing of other fees, charges and taxes. The single item could be labeled “Federal Charges” or “Interstate Charges”. An even better alternative might be a single

bottom-line sum that includes the cost of service plus fees. This would make it easier for customers to comparison shop for better prices because there would be only one item to compare.

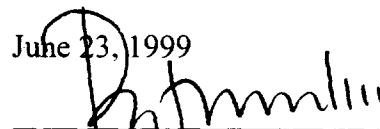
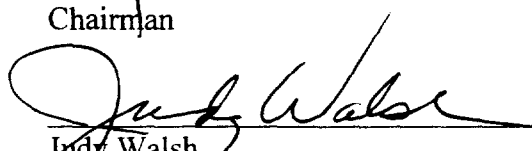
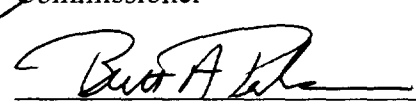
**Conclusion**

3. The Texas PUC appreciates the opportunity to contribute to the Commission's efforts in an area of great importance to customers. The standard label guideline, as well as others adopted, should simplify bills and help protect customers from unauthorized charges.

Respectfully submitted,

Public Utility Commission of Texas  
1701 N. Congress Avenue  
Austin, Texas 78711

June 23, 1999

  
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